

F I L E D

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

NOV 30 2000

PEGGY B. DEANS, CLERK
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF N.C.

IN RE:)	
)	CHAPTER 7
INTERNATIONAL HERITAGE, INC.)	CASE NO. 98-02675-5-ATS
)	
INTERNATIONAL HERITAGE,)	CHAPTER 7
INCORPORATED,)	CASE NO. 98-02674-5-ATS
)	
Debtors.)	

**INTERIM APPLICATION FOR SPECIAL ATTORNEY
FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT**

The undersigned Stephani W. Humrickhouse of Nicholls & Crampton, P.A. ("Applicant") applies to the Court for the entry of an Order approving and authorizing interim Special Attorney for Trustee's fees for the period August 29, 2000, to November 27, 2000, in the amount of \$42,247.00, and expense reimbursement in the amount of \$1,198.46. In support of said Interim Application, Applicant respectfully shows the Court the following:

1. Applicant has acted as Special Attorney for the Trustee since employed and appointed by Order dated January 28, 1999. The services rendered by Applicant and members of its firm have been substantial and Applicant believes that allowance of a fee in full at this time is appropriate and necessary. Additionally, in light of the substantial commitment of time and resources by the Applicant and her firm during this period investigating possible preference claims against 378 entities and evaluating and initiating over ninety (90) adversary proceedings, Applicant requests that the Court consider this Application at this time notwithstanding the fact that the previous fee application was filed less than 120 days ago.

2. The statute of limitations for bringing avoidance actions in this case expired on November 24, 2000. Due to extended litigation concerning the assertion of certain privileges by prior officers of the Debtor, the Trustee was unable to obtain access to thousands of documents necessary to the evaluation of the avoidance actions until the Summer of 2000. Additionally, because of the ongoing government investigation of the Debtor and some of its former principals, access to those important documents was further limited, restricted and inconvenient. The result of the inaccessibility of the documents was a severely constructed period of approximately 3-4 months to review documents, evaluate causes of action and draft complaints. Applicant completed her review and initiated the avoidance actions prior to the expiration of the statute of limitations, but not without a concerted and overwhelming effort by her and her firm, to the exclusion of all other cases in the office.

3. To date, the Applicant has delivered the sum of \$67,712.51 to the Trustee for preferences collected prior to the initiation of adversary proceedings. The Applicant has also settled three adversary proceedings pending court approval, for an additional sum of \$24,112.66.

4. A Summary of Services Rendered which indicates the name of the attorney or paralegal, the hours spent, the hourly rate and total compensation requested is attached as Exhibit A. Attached as Exhibit B is a breakdown by hours and description of the services rendered in connection with this Application. Services rendered were reasonable and necessary in the proper representation of the Trustee. Said Exhibit B reflects an itemization of expenses incurred on behalf of the Trustee by category totals.

5. The Trustee's agreement to pay the fees at the rates set out herein are substantiated in its Application by Trustee for Authority to Employ and Appoint Attorney Specially dated January 27, 1999. Stephani W. Humrickhouse has rendered professional services of not less than 193.50 hours and that for such professional services Trustee agreed to pay the rate of \$145.00 per hour. Phyllis W. Hill has rendered paralegal services of not less than 191.50 hours and that for such paralegal services Applicant is regularly paid at the rate of \$65.00 per hour. Sandra T. Waller has rendered paralegal services of not less than 26.80 hours and that for such paralegal services Applicant is regularly paid at the rate of \$65.00.

6. Stephani W. Humrickhouse is a Partner with Nicholls & Crampton, P.A. She is a Board Certified Specialist in Bankruptcy Law by the North Carolina State Bar Board of Legal Specialization, is a former member of the Bankruptcy Council of the North Carolina Bar Association, previously served as Chairman of its Continuing Legal Education Committee, is a Certified Bankruptcy Specialist by the American Bankruptcy Certification Board and is an experienced Chapter 11 bankruptcy practitioner. Humrickhouse was admitted to the bar in 1980. Humrickhouse regularly charges and has been paid as her ordinary rate \$200.00 per hour. However, based on Court guidelines for the representation of the Trustee, she has only charged \$145.00 per hour during the time period covered by this Application in this case.

7. Phyllis W. Hill is a Paralegal with Nicholls & Crampton, P.A. She attended the University of Tennessee in Knoxville, TN majoring in Business Administration and received her paralegal/legal assistant degree from UT. She has been a paralegal since 1977 with seven years experience in Tax, Estate Planning, Trust and Estate Administration in Knoxville, TN, eight years experience in Civil Litigation with Hunton & Williams in Raleigh, NC and has been with Nicholls & Crampton since February, 1993, concentrating in Bankruptcy.

8. Sandra T. Waller is a Paralegal with Nicholls & Crampton, P.A. She attended Florida State University, Tallahassee, FL and received her paralegal/legal assistant training at Lively Vocational/Technical School, Tallahassee, FL. She has been a paralegal since 1982 with experience in Personal Injury, Medical Malpractice and Litigation. She has been employed at Nicholls & Crampton since January, 1998, concentrating in Bankruptcy.

9. Copying charges are recorded by client identification number, pursuant to a control counting device connected to Applicant's copying machine. The copying charges are read by Applicant's Office Administrator twice monthly, at mid and end month, and entered into the Accounting Package on those "read" dates. Applicant does not have the ability to further break down the dates such copying charges were incurred other than as expressed above.

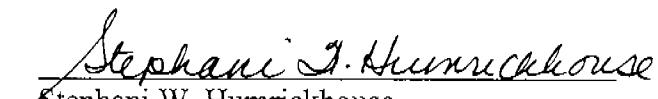
10. Postage charges for are entered cumulatively at month's end.

11. Copies are charged at 20¢ per page, and fax transmissions are charged at \$1.00 per page for out-going transmissions, with no charge for incoming faxes. Deliveries are charged at the rate of \$7.50. Mileage reimbursement was made at the rate of 31¢ per mile.

12. The best interests of Trustee, the Debtor, and the Estates will be served by the allowance of this Application in full.

WHEREFORE, Applicant respectfully requests the Court for the entry of an Order allowing and authorizing Special Attorney for Trustee fees in the amount of \$42,247.00, and expense reimbursement in the amount of \$1,198.46.

This the 27 day of November, 2000.



Stephani W. Humrickhouse
State Bar No. 9528
Attorney for Trustee
Nicholls & Crampton, P.A.
Post Office Box 18237
Raleigh, NC 27619
Telephone: 919/781-1311

UNITED STATES BANKRUPTCY COURT
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SUMMARY OF SERVICES RENDERED

Nicholls & Crampton, P.A.

From August 29, 2000 through November 27, 2000, the undersigned person/firm has performed professional services for this estate in the capacity of attorney for the Trustee during the Chapter 7 case. Attached hereto is an itemization of time expended and expenses incurred in the performance of these professional services.

<u>NAME</u>	<u>TITLE</u>	<u>HOURS SPENT</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stephani W. Humrickhouse	Partner	193.50	\$145.00	\$28,057.50
Phyllis W. Hill	Paralegal	191.50	\$ 65.00	\$12,447.50
Sandra T. Waller	Paralegal	26.80	\$ 65.00	\$ 1,742.00
			TOTAL FEES	\$42,247.00
			TOTAL EXPENSES	\$ 1,198.46
			TOTAL AMOUNT REQUESTED	\$43,445.46

In Account With

NICHOLLS & CRAMPTON, P.A.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700
Post Office Box 18237

Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #
56-1201204

11/29/00

Invoice 33589

TO Holmes P. Harden
c/o Maupin, Taylor & Ellis, PA
3200 Beechleaf Ct. POB 19764
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7
Amount Paid: _____

Return Upper Portion With Payment

For legal services rendered; including
but not limited to

08/29/00	PL9	Review MS Excel spreadsheet of preference payments in preparation for creation of demand letter.	.80
08/30/00	P20	Draft Attorney for Trustee Fee App. and Order	.40
09/13/00	HUM	Draft preference letter.	.80
09/15/00	PL9	Work on creating data base for 90-day preference action demand letter, conf. with technical support re: same.	3.50
09/18/00	HUM	Work on preference action demand letters (1.5); conference with Holmes Harden re: same (.3); letter to Brent Wood and Joe Cheshire re: document production (.5).	2.30
09/19/00	HUM	Work on preference demand letter; conference with Holmes Harden re: insider claims, 502 objections and preference actions.	3.30
09/19/00	PL9	Continue work on data base for preference action, tele. conf. with CPA re: spreadsheet info.	4.50
09/20/00	PL9	Continue work on spreadsheet data	1.50

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

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Return Upper Portion With Payment

base for demand letter.

09/23/00	P20	Generation of preference letters.	4.00
09/24/00	P20	Generation of preference letters.	1.00
09/25/00	HUM	Various creditors conference re: preference letter.	2.10
09/25/00	P20	Complete mail out of letters to creditors re: preference payment	4.00
09/25/00	PL9	Tele. calls from preference creditors re: demand letter and create new data base to process responses thereto, Internet search for addresses.	1.80
09/26/00	PL9	Return tele. calls from preference creditors.	.50
09/27/00	PL9	Return and process tele. calls to recipients of preference demand letters, tele. conf. with Adams re: missing information and bank account records.	2.50
09/28/00	HUM	Evaluate discoveries of phantom temporary vendor files.	4.50
09/28/00	PL9	Work on data base of tele. calls and letters received in response to preference demand letter, tele. conf. with Adams re: Great Plains	4.00

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Return Upper Portion With Payment

spreadsheet and documentation,
return tele. calls from creditors.

09/29/00	P20	Calls from numerous creditors re: letter re: preference payment	.60
09/29/00	PL9	Return tele. calls from preference creditors and continue data base of responses to demand letter.	3.00
10/02/00	P20	Calls from preferential payment recipients	.30
10/02/00	HUM	Meeting with Craig Adams, Holmes Harden, U. S. Attorney and FBI (2.2), Prepare subpoena letter to Scott Wilsonson re: goverment documents (.4)	2.60
10/02/00	PL9	Work on preference data base and respond to tele. calls from creditors, prepare for and attend meeting with CPA, Trustee, FBI Special Agent and Assist. U.S. Attorney re: status of case and lack of documentation and information for complete preference actions.	3.00
10/03/00	P20	Calls from preferential payment recipients	.20
10/03/00	HUM	Various calls from creditors re:	2.20

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Return Upper Portion With Payment

preference letters.

10/03/00	PL9	Organize pleadings for bankruptcy case and adversary proceedings, respond to tele. calls and letters from preference creditors.	2.50
10/04/00	P20	Calls from Preferential Payment Recipients	.30
10/04/00	HUM	Set up document review at Cheshire office (.3); Calls from creditors re: preference letters (1.8); Conf. with Craig Adams re: bank statements (.5)	2.60
10/05/00	PL9	Return tele. calls and correspondence from preference creditors, tele. conf. with Johnson re: subpoenas to banks and arranging review of documents held by FBI.	2.00
10/06/00	HUM	Draft subpoena language re: bank documents for Scott Wilkinson, Review files re: bank information; Conference with Keith Wiles re: review of Mollick documents	1.20
10/06/00	PL9	Letter to Trustee with checks received in satisfaction of preference demand, work on response log and tele. calls.	4.00

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Return Upper Portion With Payment

10/09/00	HUM	Work on preference actions	5.50
10/09/00	PL9	Responses to preference creditor tele. calls and letters.	1.20
10/10/00	HUM	Document review for preference actions.	6.50
10/10/00	PL9	Review Debtor records and files held by FBI for payments to vendors during 90-day preference period.	7.50
10/11/00	PL9	Prepare and send additional demand letters for 90-day preference, record creditor responses in data base and update records.	2.50
10/12/00	HUM	Conf. with various creditors	1.80
10/12/00	PL9	Review records at FBI for preference payment documentation, witness interview with IHI accounting personnel.	5.50
10/13/00	HUM	Meet with FBI re: additional preferences; Possible bankruptcy fraud, settlement effect, calls from preference targets	4.30
10/13/00	PL9	Review records at FBI for preference documentation.	7.50

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Return Upper Portion With Payment

10/14/00	PL9	Process mail received from preference creditors, update response data base, read & review Section 341 meeting minutes, draft 90-day preference action complaint.	3.50
10/17/00	P20	Research Downtown (FBI documents)	3.00
10/17/00	HUM	Calls from various preference letter recipients (.4); Work on preference complaint and procedure (2.5); Conf. with Harden re: Van Etten release (.4).	3.30
10/17/00	PL9	Review vendor files at FBI for preference support documentation.	6.00
10/18/00	HUM	Return calls to preference letter recipients (1.6); Calls to Harden re: Van Etten release (.3)	1.90
10/18/00	PL9	Review employee expense files at FBI for preference support documentation.	5.00
10/20/00	HUM	Calls to recipients of preference letters	.60
10/20/00	PL9	Responses to communication from preference creditors, organize and Bates stamp documents received, work on finalizing complaint and	4.00

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Return Upper Portion With Payment

adv. proc. info.

10/23/00	HUM	Various calls from preference letter recipients, Call to Holmes re: settlement authority, Draft form Complaint	4.60
10/23/00	PL9	Prepare letters to preference creditors who paid preference amount with proof of claim and instructions, prepare and send additional demand letters for 90-day preference, work on data base.	5.00
10/24/00	HUM	Various creditor calls re: preferences, work on complaints	5.20
10/24/00	PL9	Review Debtor's records held by FBI for insider preference docs.	6.00
10/25/00	HUM	Confs. with creditors, review documents	2.30
10/26/00	PL9	Letter to Trustee with 90-day preference payment checks, return tele. calls from creditors, data base update.	1.50
10/29/00	HUM	Review 341 transcript and other documents	3.50
10/31/00	PL9	Review records at FBI.	7.00

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Return Upper Portion With Payment

11/01/00	PL9	Review Trustee records held by FBI for preference actions.	3.00
11/01/00	HUM	Work on preferences	6.30
11/02/00	PL9	Determination of entities to be sued in preference actions.	2.50
11/02/00	HUM	Work on preferences	4.30
11/03/00	PL9	Review backup documentation for determination of 90-day preferences, fraudulent conveyances, insiders.	5.00
11/03/00	HUM	Work on preference actions (4.8); Conf. with Jean Broyles re: security deposits (.4)	5.20
11/04/00	PL9	Work on preference action determinations.	1.50
11/06/00	PL9	Work on drafting preference complaints, summons, AP cover sheets for filing with court.	7.00
11/06/00	HUM	Work on preferences, calls to creditor lawyers re: settlements	4.50
11/07/00	PL9	Continue work on drafting preference complaints.	5.50
11/07/00	HUM	Work on preference actions,	5.20

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Return Upper Portion With Payment

conference with Callaway re: Atcom
action

11/08/00	PL9	Work on preference actions.	4.50
11/08/00	HUM	Work on preference actions	6.50
11/09/00	PL9	Work on preference actions.	4.00
11/09/00	HUM	Work on preferences actions.	5.60
11/10/00	PL9	Work on preference actions.	7.00
11/10/00	P20	Prepare Summons and service of AP Complaints	1.00
11/10/00	HUM	Work on preference actions	5.30
11/11/00	PL9	Work on preference actions.	8.00
11/11/00	HUM	Work on preference actions	10.20
11/13/00	PL9	Work on preference actions.	2.70
11/13/00	P20	File AP Complaints	.50
11/13/00	HUM	Work on preference actions (4.3); Conf. with Brent Wood re: avoidance actions against him and firm (.6)	4.90
11/14/00	PL9	Work on preference actions.	7.50
11/14/00	P20	Work on AP's, Summons and Service	2.00

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Return Upper Portion With Payment

of Complaints

11/14/00	HUM	Work on preference action	8.30
11/15/00	PL9	Work on preference actions.	3.00
11/15/00	P20	Preparation of AP Complaints and Summons	1.50
11/15/00	HUM	Work on preference actions	8.70
11/16/00	PL9	Work on preference actions.	3.00
11/16/00	P20	Research and Service of AP Complaints	1.50
11/16/00	HUM	Work on preference actions (8.3); Meet with BTI re: preference action (1.5)	9.80
11/17/00	PL9	Work on preference actions.	5.00
11/17/00	P20	Preparation of AP Complaints and Summons	1.50
11/17/00	HUM	Work on preference actions (8.3); Respond to creditor inquiries (.6); Meet with Brent Wood & Holmes Harden re: preference action (1.5)	10.40
11/18/00	PL9	Draft 90-day preference demand letter, review CPA records, input data for preference actions.	4.00

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11/18/00	PL9	Work on preference actions.	10.00
11/18/00	HUM	Work on preference actions.	5.20
11/19/00	HUM	Work on preference actions.	6.30
11/20/00	PL9	Work on preference actions.	8.00
11/20/00	P20	Preparation of AP Complaints and Summons, Hand Delivery to Courthouse for filing	2.00
11/20/00	HUM	Work on preference actions, draft tolling agreements for Brent Wood and BTI	8.30
11/21/00	HUM	Work on preference actions, conf. with Harden re: tolling agreements and lien avoidance actions, review complaints filed	9.30
11/22/00	PL9	Work on preference actions.	3.00
11/22/00	P20	Prepare AP's and Summons, deliver to Court for filing and issuance	3.00
11/22/00	HUM	Work on preference actions	7.30
11/27/00	PL9	Prepare summonses to be re-issued and re-served and other work on preference actions.	1.50
11/27/00	HUM	Various creditor calls, reissuance	.80

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of summonses, modification of
complaints

	Fees Billed	\$ 42,247.00
<hr/>		
Disbursements		

Postage	\$ 46.29	
Delivery Charge	\$ 7.50	
3850 Copies at \$.20 ea.	\$ 770.00	
Fax	\$ 124.00	
Travel	\$ 21.82	
Professional Service	\$ 50.00	
Meals	\$ 22.80	
Telephone Charges	\$ 38.00	
Total Disbursements	\$ 1,198.46	

Total Current Bill	\$ 43,445.46	

Balance Due	\$ 43,445.46	
=====		

Fee Summary

Paralegal PWH worked 191.50 hours at \$ 65 an hour.
S T Waller worked 26.80 hours at \$ 65 an hour.

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c/o Maupin, Taylor & Ellis, PA
3200 Beechleaf Ct. POB 19764
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - ~~Amount Paid: Chapter 7~~

Return Upper Portion With Payment

S W Humrickhouse worked 193.50 hours at \$145 an hour.

A finance charge is computed on account balances unpaid 30 days
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

Exhibit C

INTERNATIONAL HERITAGE, INC.
INTERNATIONAL HERITAGE, INCORPORATED

Interim Attorney for Debtor's Fees and Expenses Allowed:

<u>Date Order Entered</u>	<u>Interim Fees</u>	<u>Expenses</u>
October 25, 1999	\$19,830.50	\$412.50
October 23, 2000	\$ 2,972.50	\$186.10

CERTIFICATE OF SERVICE

I, Holmes P. Harden, do hereby certify that the INTERIM APPLICATION FOR SPECIAL ATTORNEY FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT was served this day by placing a copy thereof in a depository under the exclusive care and custody of the United States Postal Service in a postage prepaid envelope and properly addressed as follows this 30th day of November, 2000.

MAUPIN TAYLOR & ELLIS, P.A.

BY: 
Holmes P. Harden
N. C. State Bar No. 9835
Post Office Drawer 19764
Raleigh, NC 27619
Telephone: (919) 981-4000

SERVED:

Marjorie K. Lynch
Bankruptcy Administrator
P. O. Box 3039
Raleigh, NC 27602-3039